

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

INTERFOCUS INC., a California
Corporation

Plaintiff,

v.



Defendant.

Case No.: 1:22-cv-2259

**DECLARATION OF AMANDA RICHARDSON-GOLDEN IN SUPPORT OF
PLAINTIFF'S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY RESTRAINING
ORDER, INCLUDING A TEMPORARY INJUNCTION, A TEMPORARY ASSET
RESTRAINT, AND EXPEDITED DISCOVERY**

DECLARATION OF AMANDA RICHARDSON-GOLDERN

I, Amanda Richardson-Golden, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am a paralegal working for the law firm Rimon P.C. I work and live in Chicago, Illinois.

3. On January 26, 2022, I ordered thirteen (13) products of six (6) different designs from the "[REDACTED]" website. I ordered those products in connection with Rimon client InterFocus, Inc.'s investigation into [REDACTED] and ordered them because I understand they may infringe Interfocus' copyrights or copy other famous brands. I directed that they be shipped to my home address in Chicago, Illinois. The total amount paid was \$223.19. A true and correct copy of the receipt for this order is attached as **Exhibit 1**.

4. On or about February 20th, 2022, I received a package from [REDACTED]. Twelve (12) products arrived. I took photos of the products a day or two after the arrival. A true and correct copy of the photos of the products which I understand as copying famous brands is attached as **Exhibit 2**.

5. I took multiple photos of the products which I understand as infringing Interfocus' copyrights. A true and correct copy of the photos of products which I understand as infringing Interfocus copyright (certificate # VA0002282656) is attached as **Exhibit 3**. A true and correct copy of the photos of products which I understand as infringing Interfocus copyright (certificate # VA0002266891/VAu001420322) is attached as **Exhibit 4**. A true and correct copy of the photos of products which I understand as infringing Interfocus copyright (certificate #

VA0002282229) is attached as **Exhibit 5**.

6. On or around March 3, I ordered another five products, which I understand also infringing our client Interfocus' copyrights, to be shipped to my home address in Chicago, Illinois. A total of \$361.42 was paid. A true and correct copy of the order receipt is attached as **Exhibit 6**. As one can see, the top of the receipt was labeled "Shipped". But it has been more than six weeks and I still have not received the products. Multiple messages and phone calls to the customer service at [REDACTED] have received assurances that the products are on their way. As of today, I have not received this order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 22nd day of April, 2022 at Chicago, Illinois.


Amanda Richardson Golden